

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LYNN SANSOUCIE,

Plaintiff,

v.

**REPRODUCTIVE ASSOCIATES OF
DELAWARE, P.A.,**

Defendant.

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Civil Action No. 04-0861-JJF

DEFENDANT'S PROPOSED SPECIAL VERDICT

David H. Williams, Esquire (ID#616)
Jennifer L. Brierley, Esquire (ID#4075)
MORRIS, JAMES, HITCHENS
& WILLIAMS LLP
222 Delaware Avenue, 10th Floor
Wilmington, DE 19801-1621
(302) 888-6800
dwilliams@morrisjames.com
jbrierley@morrisjames.com
Attorneys for Defendant

Dated: May 3, 2005

SPECIAL VERDICT

As part of your deliberations, please answer the following questions:

LIABILITY

1. Do you find by a preponderance of the evidence that Ms. Sansoucie was exempt from the overtime requirements of the Fair Labor Standards Act because she was employed as a professional employee?

Yes _____

No _____

[Answer Questions No. 2 only if you answered "Yes" to Question No. 1.]

2. Do you find by a preponderance of the evidence that Reproductive Associates' violation of the FLSA was willful?

Yes _____

No _____

DAMAGES

[Answer Question No. 3A only if you answered "No" to Question No. 2.]

3A. What back pay do you award Ms. Sansoucie calculated from July 14, 2002 until the date of her resignation (i.e., February 4, 2004)?

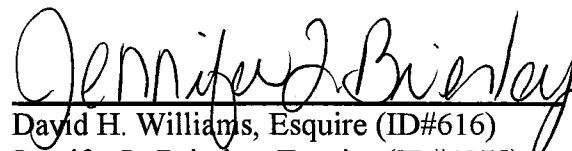
Answer in dollars and cents \$ _____

[Answer Question No. 3B only if you answered "Yes" to Question No. 2.]

3B. What back pay do you award Ms. Sansoucie calculated from July 14, 2001 until the date of her resignation (i.e., February 4, 2004)?

Answer in dollars and cents \$ _____

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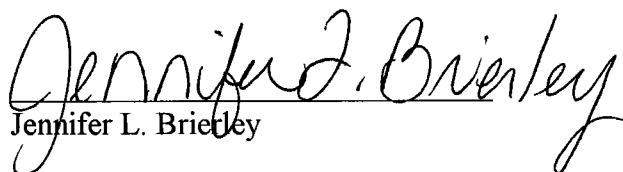
Dated: May 3, 2005

CERTIFICATE OF SERVICE

I, Jennifer L. Brierley, hereby certify that on this 3rd day of May, 2005, I caused to be served a true and correct copy of Defendant's Proposed Special Verdict by electronic delivery and mail to:

Jeffrey K. Martin
Margolis Edelstein
1509 Gilpin Avenue
Wilmington, DE 19806

Attorney for Plaintiff Lynn Sansoucie


Jennifer L. Brierley